



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

September 6, 2016

Mr. Jeffrey D. Williams  
East Campus Integration Program EIS  
c/o HDR, Suite 100  
2600 Park Tower Drive  
Vienna, VA 22180

Re: Draft Environmental Impact Statement for the East Campus Integration Program, Fort Meade, Maryland (CEQ #20160168)

Dear Mr. Williams:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement (DEIS) for the East Campus Integration Program (ECIP) in Fort Meade, Maryland. The DEIS has been prepared by the National Security Agency in compliance with NEPA.

The purpose of the Proposed Action is to provide facilities that are fully supportive of the Intelligence Community's function and to continue integrating the East Campus with the National Security Agency (NSA) Main Campus. The need for the Proposed Action is to meet mission requirements, both internally at the NSA and within the Intelligence Community.

The DEIS evaluates the Proposed Action (Preferred Alternative) which is to continue integrating the NSA East Campus with the NSA Main Campus through development of operational complex and headquarters space in the northern portion of the East Campus (approximately 84 acres) and the 9800 Troop Support Area (approximately 49 acres) west of the northwest portion of the East Campus to provide administrative capacity for an increase of 7,200 personnel currently located offsite.

The Proposed Action entails construction and operation of 2,880,000 square feet (ft<sup>2</sup>) of new operational complex and headquarters space consisting of five buildings and supporting infrastructure within the 150-acre ECIP project area, and demolition of approximately 1.9 million ft<sup>2</sup> of buildings and infrastructure on the NSA Main Campus (1,291,206 ft<sup>2</sup>) and the 9800 Troop Support Area (592,269 ft<sup>2</sup>). The ECIP project area includes the locations being considered for development of operations and headquarters space; some parking facility location alternatives and locations of buildings proposed for demolition that are outside of this project area. The proposed infrastructure would include an electrical substation, emergency generator

capacity providing 121 megawatts (MW) of electricity; life-safety generators; building heating systems; utilities, including water, natural gas, and communications services; transportation infrastructure, including roads, parking structures, and sidewalks; and stormwater management facilities. Additionally, use of multi-level parking facilities would be considered in lieu of surface parking. The DOD proposes to develop the ECIP over a period of approximately 10 years (fiscal years 2019 to 2029).

In addition to the Proposed Action, two location alternatives outside of the Fort Meade area are also evaluated: the National Business Park/East Campus (Alternative 1) – this alternative would involve leasing existing or newly constructed Interagency Security Committee-qualified buildings at the northern end of the National Business Park. The other alternative is the Annapolis Junction Business Park/East Campus (Alternative 2) -- this alternative would involve a leased administrative facility at the southern end of Dorsey Run Road in the Annapolis Junction Business Park. Under these alternatives, a total of 21 MW of on-site emergency power generation would be required. Life-safety generators would also be installed on-site. Construction of an 800,000 ft<sup>2</sup> building, other smaller buildings, and associated parking facilities on the northern portion of the East Campus would still occur under these alternatives. Under these alternatives, Building 9800A on the NSA Main Campus and all nine buildings in the 9800 Troop Support Area would not be demolished; and no proposed facilities would be constructed in the 9800 Troop Support Area.

In addition to Operational/Headquarters Complex Location Alternatives the DEIS evaluates Parking Facility Location Alternatives. They are: 1) East Campus Parking Structure 2 -- located in the northeastern portion of the East Campus; 2) the Bravo Parking Lot -- is a 4.5 acre, surface parking lot located south of the 9800 Troop Support Area which would be demolished and made into a multi-level parking facility; 3) N8/N9 Parking Lot -- is a 7.1 acre surface parking lot on the NSA Main Campus that is located northwest of the intersection of Canine Road (access point to Maryland State Route 32 and Connector Road); and 4) Building 9817 -- is proposed for demolition as part of the Proposed Action and it is located on the NSA Main Campus where a parking facility could be constructed on all or part of the 8.2 acre footprint.


EPA understands the purpose and need for the subject project. However, as a result of EPA's review of the DEIS, EPA developed comments and questions (presented in the enclosed Technical Comments document) for your consideration. Of particular interest, is the follow-up to the 2010 DEIS (Fort George G. Meade to Address Campus Development, Site M as an Operational Complex and to Construct and Operate Consolidated Facilities to Intelligence Community Use) in which DOD would consider development of Site M under three discrete phases identified for implementation over a horizon of approximately 20 years. It appears that the current EIS builds on NSA's goals as outlined in the 2010 EIS and that the connectivity of the two actions is not apparent especially within the cumulative effects discussion. Because the exact locations of the Proposed Action are not yet defined and resources cannot be accurately determined, it is difficult to do a full assessment. Please also consider specific comments included in the enclosure to this letter that address alternatives analysis, vegetation, hazardous materials and waste, transportation/parking, cultural resources, greenhouse gas/climate change, environmental justice and children's health.

EPA rated the DEIS an EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is

insufficient information in the document to fully assess the environmental impacts of this project. A copy of EPA's ranking system is enclosed for your reference and can be found on the EPA website at the following address: <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

Thank you for the opportunity to review this project. If you have questions regarding these questions/comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765 or [delgrosso.karen@epa.gov](mailto:delgrosso.karen@epa.gov).

Sincerely,

*for*   
Barbara Rudnick  
NEPA Team Leader  
Office of Environmental Programs

Enclosure (2)

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## *Technical Comments*

### *Proposed Action*

In 2010, DOD prepared a DEIS and FEIS for the Campus Development Project at Fort George G. Meade (FGGM) that evaluated campus development initiatives involving construction of associated facilities for the National Security Agency (NSA) complex at FGGM. In this evaluation, DOD proposed to develop a portion of Fort Meade (referred to as “Site M”) as an operational complex. The development of Site M (which consists of approximately 227 acres), would be considered under three discrete phases (Phase 1, Phase II and Phase III) over a horizon of approximately 20 years. Under Phase 1, development would occur (approximately 2012 to 2014) supporting 1.8 million square feet (ft<sup>2</sup>) of facilities for a data center and associated administrative space. As noted in the Record of Decision, DOD’s Preferred Alternative was to implement the Proposed Action (Phase 1) to develop “Site M” at Fort Meade as an operational complex and to construct and operate consolidated facilities for Intelligence Community Use. Implementation of the Preferred Alternative would provide up to 1.8 million square feet of facilities.

Page 1-1 states, “The Record of Decision (ROD) for the 2010 Campus Development EIS allowed for initiation of construction currently occurring in the southern portion of the East Campus. The Proposed Action identified in this EIS addresses build-out of the northern portion of the East Campus and the adjacent 9800 Troop Support Area, and integration of the East Campus with the NSA Main Campus.” Even though the 2010 EIS and the current EIS may address different areas of the East Campus, the current EIS should discuss what has been implemented to date from the 2010 EIS. The EIS, and in particular the Cumulative Impacts discussion, does not distinguish actions implemented from the 2010 EIS. The current EIS should identify those completed actions and actions that may not have been completed. The 2010 Campus Development EIS projected 6,500 NSA personnel on the East Campus under the Preferred Alternative (Phase I), [Alternative 1 (Phases I and II) would support 8,000 personnel, and Alternative 2 (Phases I, II, III) would support 11,000 personnel.] If the 2010 EIS represented Phase I (the Preferred Alternative), does the current EIS represent Phase II of the 2010 EIS (which was projected to support approximately 8,000 personnel) or will additional environmental analysis be forthcoming?

Please discuss the development of Site M as a result of the 2010 EIS. Is there any overlap of Site M from the 2010 EIS to the current EIS? i.e., what has been done on Site M as a result of the 2010 EIS (or is yet planned); will the current proposed parking facility East Campus Parking Structure 2 (ECPS 2) be affected by actions proposed in the 2010 EIS (in particular, Site M)? As stated on page ES-3 “Construction of an 800,000 ft<sup>2</sup> building, other smaller buildings, and associated parking facilities on the northern portion of the East Campus would still occur under these alternatives.” Since this is common for all location alternatives, please depict on a map where these buildings will be located and show proximity to the proposed ECPS 2.

Page 2-9 states, “The area proposed for ECPS 2 is currently being used as a staging area for ongoing construction in the southern portion of the East Campus. ECPS 2 would be bordered to the west, north, and east by a potential reforestation area for ECB 2 (part of the action analyzed in the 2010 Campus Development EIS) and ECB 3, and to the south by the Venona Road corridor. ECPS 1 is in the southern portion of the East Campus, which is currently under construction.” Please discuss/depict these referenced sites on a map to better understand the

relationship of buildings to proposed actions. It is assumed that the ECB 3 is the proposed 800,000 ft<sup>2</sup> building. Please confirm. If the site proposed for ECPS 2 is now used as a staging area for ongoing construction, is there another area designated to become a staging area? If so, where and please describe the area and include/depict on a map.

Page 2-1 states, “An approximately 18-acre triangular site east of the 9800 Troop Support Area and west of the northern portion of the East Campus is also part of the ECIP project area.” Please describe what action (if any) would occur on the 18-acre site. It is not clear if this statement is just informing that this area is a part of the ECIP project area or if an action will occur on this site.

Page 4-42 states, “Six buildings on the NSA Main Campus, all nine buildings in the 9800 Troop Support Area, and three surface parking lots would be demolished to provide room for the proposed facilities and supporting infrastructure.” Table 4.8-1 (Buildings Proposed for Demolition as part of the Proposed Action) lists the specific buildings proposed for demolition. Figure 2-1 (Proposed Action and Surrounding Areas) highlights buildings proposed for demolition, but does not identify them by name. Please identify the buildings by name on a figure. There should be a map that coincides with Table 4.8-1 to better depict that which is proposed.

Page 2-1 states, “Implementation of the ECIP entails construction and operation of new facilities for operations and headquarters space within the 150-acre ECIP project area and demolition of buildings and infrastructure.” Further in the discussion it states, “The NSA East Campus is east of the NSA Main Campus and consists of approximately 240 acres (NSA 2013a) ....” Can it be assumed that implementation of the Proposed Action would involve 150 acres of the 240 acres of the East Campus? If so, describe the remaining 90 acres (i.e. forested, etc.). Please clearly define the exact acreage impacted for the Proposed Action/Preferred Alternative. As an aside, the 2010 EIS referred to Site M as consisting of 227 acres. Please quantify the size of the Site M areas within the ECIP project area and show where the proposed actions will be located, even if approximates.

### **Alternatives Analysis**

Page 2-6 states, “Alternative sites outside of Fort Meade are being considered to allow for planning flexibility particularly in the event that the 9800 Troop Support Area was not available in the future for the ECIP. Under these alternatives, Building 9800A on the NSA Main Campus and all nine buildings in the 9800 Troop Support Area would not be demolished and no proposed facilities would be constructed in the 9800 Troop Support Area.” What would prevent the 9800 Troop Support Area (and Building 9800A) from being used in the future for ECIP; is this still likely?

The Proposed Action does allow for the demolition of the 9800 Troop Support Area and Building 9800A. Thus, the National Business Park/East Campus (Alternative 1) and Annapolis Junction Business Park/East Campus (Alternative 2) would be the more environmentally preferred alternatives compared with the Proposed Action/Preferred Alternative. Since the Proposed Action does allow for the demolition of the 9800 Troop Support Area and Building 9800A, are Alternatives 1 and 2 viable alternatives? The EIS should discuss why the Proposed

Action is preferred over the two location alternatives. The comparison of the alternatives is the heart of the environmental document. The rationale for the selection of the preferred alternative should be clearly stated in the analysis and for the alternatives that are eliminated, the reasons for their elimination should be given. Please elaborate in Section 2.4 (Identification of the Preferred Alternative).

### **Vegetation**

Page 4-29 states, "Some activities associated with the Proposed Action would entail clearing of vegetation, grading, and paving in areas where there are no existing structures or infrastructure." The EIS should estimate the quantity of vegetation to be removed. In addition, the composition and characteristics of each community type should be summarized and the functions and total acreage indicated. This information is important so as to mitigate for the same or comparable resources. The EIS should also project the increase in impervious surface due to the Proposed Action.

Page 4-38 states, "The total acreage of vegetation disturbed as a result of the Proposed Action would depend on the final design, layout, and site of the proposed structures and facilities, and the constraints of each of the sites. In keeping with the FCA, NSA would preserve or reforest acreage equal to 20 percent of the total area developed on the East Campus. Preservation of forested area or reforestation would be factored into the ECIP design process. Reforestation would occur on-site or nearby. Groups of three or more landscape trees can be planted as part of reforestation techniques. If reforestation is not entirely possible on-site, then alternative sites would be designated for reforestation." Even if there is not a final design or layout, there should be some general knowledge of where sites for structures and facilities can be placed in order to fully assess environmental impacts. This information is important in determining the best possible location for proposed sites and selecting site designs that avoid impacts to resources and maximize function of reforestation. Native plants are highly recommended. This information is critical to the environmental analysis and without it a proper assessment cannot be made. Please address within the FEIS.

### **Prime Farmland Soils**

Page 4-29 states, "The Downer-Hammonton complex, 2 to 5 percent slopes and the Patapsco-Evesboro-Fort Mott complex, 0 to 5 percent slopes are the only soils within the ECIP project area identified as prime farmland soils. Similar to other soils at the ECIP project area, these soils have been disturbed due to previous development and are not currently used for agriculture; therefore, no impacts on prime farmland would be expected." Does the Natural Resources Conservation Service (NRCS) have to be notified when prime farmland soils are impacted even though the soils are not currently used for agriculture? Please address.

### **Hazardous Materials and Waste**

Page 2-4 states, "Both the upgrades to the existing plants and the proposed plants would have associated switch gear, substation and associated equipment and duckbanks, air pollution control equipment, oil storage tanks, and urea storage tanks. Three days (72 hours) of fuel to operate any generators, if ultimately selected, would be stored onsite." Where are the proposed

plants, oil storage tanks and urea storage tanks to be located and what resources may be impacted?

Page 4-54 states, “Onsite storage of petroleum products for construction and demolition would be accomplished through the installation of temporary diesel and gasoline ASTs, as necessary. These ASTs would be removed following the completion of construction and demolition, and all contractors would use proper BMPs (e.g., secondary containment, inspections and spill kits) and adhere to Federal and state regulations and the applicable NSA SPCC Plan to minimize the potential for releases from the ASTs.” The FEIS should identify where temporary diesel and gasoline ASTs would be installed and discuss potential resource impacts.

Pages 4-55 and 4-56 state how hazardous waste would be addressed if encountered during land-clearing, excavation, grading, etc. However, there does not appear that these measures are formalized or documented in a plan. Please ensure that a Contingency Plan is in place to address hazardous waste (including asbestos, lead, PCBs, and ordnances) that may be discovered during construction.

Page 4-56 states, “The footprint of construction and demolition overlaps with five other AOI sites (i.e., Site M – Parcel 1, Site M – Parcel 8, Non-SWMUs 12 and 13, FGGM 75, and FGGM 006-R-01), each of which are closed and require no further action.” What is to be constructed in these locations (it is assumed the proposed parking facility will be between Site M – Parcels 1 and 8); however, is there anything else proposed? The FEIS should identify proposed construction on/near these sites. Please include FGGM 003-R-02 since this site overlaps a large percentage of the ECIP project area consisting of 322 acres. This large site has land use controls with long-term management and it is unclear in Figure 3.11-1 (Locations of AOI sites that overlap with the Proposed Action) how this area cannot be affected by the Proposed Action. Please address.

### **Building Heating System Alternatives**

EPA appreciates the analysis on the building heating system alternatives. Alternatives for building heating systems considered include packaged boilers, ground source heat pumps (GSHPs), and a hybrid heating system consisting of both boilers and GSHPs. Based on the evaluation, the packaged boiler and hybrid building heating system alternatives were carried forward for analysis in the EIS. The building heating systems alternatives should include specific details on the open space requirements (space constraints) for the Ground Source Heat Pump Alternative and possible locations for the GSHP.

Page 2-11 states, “This alternative does not meet the evaluation criteria because combustion turbines cannot be used to complete the 15.4 MW of outstanding capacity at the existing emergency generators; this 15.4 MW of capacity must be met by generators.” Since turbines can be sized for various outputs, it is unclear why the combustion turbine alternative was eliminated from further detailed analysis. Please explain.

### **Parking**

Pages ES-3 and ES-4 discuss the parking facility location alternatives. The Bravo Parking Lot (4.5 acres) would be demolished and a multi-level parking facility would be constructed on all or part of the site. The N8/N9 Parking Lot is 7.1 acres and Building 9817 (8.2 acres) would be demolished and a parking facility would be constructed on all or part of the footprint. What is the history of building 9817? What would become of the area not used for the parking facility? The DEIS does not state the size of the proposed ECPS 2 parking structure. Please specify and address capacity proposed for each of the proposed parking structures, the number of spaces needed, and parking ratio per employee that each is to accommodate. The parking space alternatives should also include an estimate of the walking distances to the office facility buildings/complex. Calculation of added impervious surface should be included in the EIS and mitigation proposed. Parking designs should incorporate Low Impact Designs, runoff capture and infiltration, etc to the greatest extent possible. Commitment to these features should be made in the FEIS and ROD.

Page 4-8 states, "It is assumed that three of the four parking facility alternatives would be constructed under the Proposed Action." The text also states, "For purposes of the traffic study completed for this EIS, it was assumed those parking facilities would be located at the ECPS 2, Bravo, and Building 9817 parking facility alternative locations." Thus, it is assumed that these three parking facilities are the Preferred Alternative parking facilities. Please address why these parking facility alternatives were selected and why the N8/N9 Parking Lot was eliminated. As depicted in Figure 3.7-1, the location of ECPS 2 parking facility infringes upon the forested area. Is it possible to move the ECPS 2 parking facility or design the facility so that it does not impact the forested area? Again, the size of the ECPS 2 parking facility is not stated and it can be assumed that there is flexibility to adjust the facility at this stage of project planning. Doing so would show efforts to minimize impacts to forested areas to the maximum extent practical while continuing to sustain and support current and future missions.

### **Transportation Network**

With the implementation of the Proposed Action, off-post roadways will be negatively impacted with many segments experiencing decreases in Level of Service (LOS) and increases in traffic density. For example, there will be substantial degradation of LOS at Vehicle Control Points (VCPs) and intersections east of Baltimore-Washington Parkway/MD 295, some LOS values falling to an F. We recommend that the EIS study describe proposed highway infrastructure projects to improve the interchange and other neighboring roads. Letters documenting coordination and communication with the Maryland State Highway Administration (SHA) should be included in the EIS. The EIS should identify capacity of local highways, projects currently planned and confirm if the proposed project will address new requirements. Coordination with National Park Service should also be documented. The EIS should estimate impacts that would be associated with improvements to regain LOS. Alternatives that would have less traffic impact to BWP should be considered. The EIS should begin to provide estimates on resources in the area, including aquatic, to identify any high quality resources that should be avoided to limit impact on stressed systems.

With off-post roadways being negatively impacted during construction and operation of the East Campus Integration Program, it is important to consider the impacts on the surrounding transportation networks. Greater detail into other known projects should be noted and future road improvements should be well coordinated with the East Campus Integration in order to limit the impacts on off-post roadways, many of which are high traffic areas.

- Is there a plan to implement roadway improvements that would be expected to address the LOS at failing intersections (i.e. LOS E or LOS F)? Planned improvements for neighboring roads including Route 198 and Route 175 should be explained. Potential impacts should be part of the secondary or cumulative impacts analysis.
- Transit options that have been identified should be included in the analysis. Methods to encourage staff to reduce single-occupancy commutes including car pool coordination, flex schedules or telework should be considered.
- Any secondary growth around base to support the expansion should be included in the secondary impact analysis.
- EPA recommends consideration of Maryland Department of Natural Resources Green Infrastructure (GI) mapping to determine if the project is in or near a natural Hub or Corridor. Suggestions for evaluating potential loss and maintaining GI should be included in this study.

### **Chesapeake Bay Protection and Restoration, EO 13508**

Page 3-35 states, “The surface waters near the ECIP project area are associated primarily with the Little Patuxent River, a major tributary of the Patuxent River that eventually empties into the Chesapeake Bay.” Because Fort Meade is in the Chesapeake Bay watershed, please discuss the Proposed Action in relation to EO 13508.

### **Cultural Resources**

Page 3-51 states, “The Baltimore-Washington Parkway (AA-5) is a historic district that was listed in 1991. It is located approximately 0.5 miles northwest of Building 9800A.” The EIS does not depict Building 9800A nor does it discuss elevations of the proposed parking structures. It is assumed that the parking structures can be at least 4 stories high (and possibly more). Is there any issue of height restrictions or have visual impacts been considered with regards to impacts to the listed resource? Please include any coordination and communication with the National Park Service; this coordination is important for acceptance of alternatives.

Page 3-52 states, “Fort Meade has five historic properties, including the Fort Meade Historic District (AA-34), the water treatment plant (Building 8688), and three bridges (Llewellyn Avenue Bridge, Redwood Avenue Bridge, and Leonard Wood Avenue Bridge) constructed during World War II by prisoners of war. All are eligible for listing in the NRHP. None of the previously identified historic properties at Fort Meade are located within the ECIP project area.” In addition, Site 18AN1240 (Late Archaic Period base camp) has been determined eligible for listing in the NRHP, but it is not located within the ECIP project area. How far from the Proposed Action are these eligible resources? Is it possible that the Proposed Action can impact eligible resources indirectly due to construction? Please discuss and possibly depict resources on a map to show proximity to the Proposed Action.

Page 4-43 states, “Two resources, Buildings 9800 and 9800A, were determined eligible for listing in the NRHP. Building 9800 would not be demolished or altered as part of the Proposed Action. Building 9800A is proposed to be demolished, which would constitute an adverse effect under Section 106 of the NHPA. Because of the proximity of Buildings 9800 and 9800A, there is the potential for short-term noise and vibration impacts on Building 9800 resulting from the demolition of Building 9800A; however, these impacts would be temporary and minimal and would not rise to the level of an adverse effect.” Please label all buildings mentioned in the EIS on a map, especially Buildings 9800 and 9800A. It is assumed that these buildings are part of the “9800 Troop Support Area” but it is not clear; these specific buildings should be set apart. Visually seeing these resources in connection with the Proposed Action along with approximate distances to resources should be specifically stated so as to properly analyze potential impacts.

### **Greenhouse Gas Emissions/Climate Change**

EPA appreciates the discussion of Greenhouse Gas (GHG) Emissions and Global Warming on pages 3-26 and 4-25. The Final EIS should not only ensure that implementation of the proposal incorporates within its design, measures to reduce GHG emissions, but also to adapt to climate change impacts. Alternatives should consider future climate scenarios and weather events from the National Climate Assessment (NCA), and describe how those scenarios may impact the project and its design. Any assessment done to identify climate trends and sustainable design should be mentioned in the NEPA analysis and design or construction commitments brought into a final document. CEQ released its final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in the National Environmental Policy Act Reviews. We recommend that this be referenced in the Final EIS. We recommend considering climate adaptation measures based on how future climate scenarios may impact the project. The U.S. Global Change Resource Program released the Third National Climate Assessment, the authoritative and comprehensive report on climate change and its impacts in the United States. For more information, please visit <http://www.globalchange.gov>.

The FEIS alternatives analysis should, as appropriate, consider practicable changes to the proposal to make it more resilient to anticipated climate change. EPA further recommends that the Record of Decision commits to implementation of reasonable mitigation measures that would reduce or eliminate project-related GHG emissions as well as climate change adaptation resiliency design measures.

### **Leadership in Energy and Environmental Design (LEED)**

EPA appreciates the discussion of sustainability in the DEIS in particular incorporating sustainability development strategies such as LEED. Page 4-49 states, “Regulation-compliant sustainable building features that can be cost-effectively integrated to achieve development equivalent to a LEED rating would be incorporated to the maximum extent practicable for the Proposed Action.” Since the Proposed Action (Preferred Alternative) is not the environmentally preferred alternative when comparing to the leasing options, Alternative 1 (National Business Park) and Alternative 2 (Annapolis Junction Business Park), and since both Alternative 1 and Alternative 2 have buildings that are LEED-Gold (and some LEED-Silver) certified, it should be

the goal of the Proposed Action/Preferred Alternative to achieve LEED Gold/Silver certification, especially for newly constructed buildings.

The EIS mentions the need to accommodate a greater cooling load for East Campus than for the NSA main campus. In order to facilitate cooling of the facilities, green infrastructure such as rain garden installation on all/a portion of East Campus building roofs, such as parking facilities, may help increase cooling/heating efficiency as well as serve to satisfy stormwater requirements.

### **Environmental Laws, Regulations, and Executive Orders**

The discussion provided in Section 1.3.1 (Environmental Laws, Regulations, and Executive Orders) and more specifically the Table 1-1 (List of Permits, Licenses, and Other Entitlements for the Proposed Action), should include the Executive Orders referenced in Section 3 (either directly or indirectly). For instance, EO 13693 (*Planning for Federal Sustainability in the Next Decade*), EO 11988 (*Floodplain Management*), EO 13508 (*Chesapeake Bay Protection and Restoration*), EO 12898 (*Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*), EO 13045 (*Protection of Children From Environmental Health Risks and Safety Risks*). In addition, please include Section 438 of the Energy Independence and Security Act (EISA) to the list.

### **Environmental Justice (EJ)**

The EIS did not state the methodology used to identify EJ communities nor provide clear benchmarks for identification of EJ communities. It appears that the area used for comparison may be too large; as it incorporated data from Baltimore, which may not be appropriate for the project area. The assessment needs to consider all of the impacts and benefits that may occur during the project in the study area or adjacent to it, that may reasonably be anticipated to have an impact upon minority and/or low-income populations. The localization, proximity, and magnitude of those impact needs to be taken into account. The DEIS should analyze if a disproportionate number of EJ communities have construction-related truck traffic or noise, operational traffic or noise, potential surface water sedimentation in areas that are used for subsistence fishing, etc.

It is critical to identify all at-risk populations as accurately and inclusively as possible. It is important to be as inclusive as possible, to be sure to identify all those at risk and to assure their meaningful and appropriate participation, and to be sure that their interests, needs and concerns are appropriately heard and taken into account in decision making. EPA encourages the lead agency to conduct meaningful engagement of EJ communities. The DEIS should disclose if any accommodations, such as an interpreter or providing literature/project information in other languages, were needed or made available for non-English speaking communities.

- EPA recommends the following approach to determination of appropriate benchmarks.
  - Apply the 50% test (all areas that are more than 50% are areas of EJ concern. Benchmark value should be compared to the state or county average)
  - If the percent minority population is greater than the state or county average, then this would equal the Area of Potential EJ concern; OR
  - Set a benchmark that exceeds the state or county average by a given percentage (e.g., taking 120% of the state or county average). (see below)
- We do not recommend the convention of adding 20 percentage points to the minority population percentage. Adding 20 percentage points to an average may have an unintended result on the assessment, particularly when the minority/low income population is a small percentage value. For example, if the percentage is five percent, adding 20 percentage points to that value increase the benchmark by 500%.
- We recommend a different methodology in order to be more protective of at-risk communities and more inclusive of potential communities of concern. We recommend using a benchmark calculated by taking the minority population percentage and then adding 20 percent of the value (for example,  $5\% \times 1.2$  (20 percent of 5)) = 6% a difference of 20%). This method is consistent, treating all populations the same way. We suggest that recalculated thresholds be used and reevaluate the impact assessment.

**Protection of Children from Environmental Risks and Safety Risks Health, EO 13045**

Page 2-1 states, “An approximate 18-acre triangular site east of the 9800 Troop Support Area and west of the northern portion of the East Campus is also part of the ECIP project area. This area is bordered by 3<sup>rd</sup> Cavalry Road to the west, Rockenbach Road to the north, and O’Brien to the east, and contains the Children’s World Learning Center for employee childcare and the NSA recycling yard.” The EIS did not discuss potential impacts to children’s health. Since the childcare center is part of the ECIP project area, please discuss the Proposed Action and potential impacts to children, especially those at the center. Please identify approximate number of children that use the center, age of children, and whether children remain inside or spend time outside and potential environmental health impacts that can result from implementation of the Proposed Action.

Page 3-19 states, “A recent study found ambient noise levels for the installation to be between 55 and 65 dBA DNL, depending on the noise-sensitive receptor’s proximity to major roadways NSA 2009). Therefore, the ambient noise levels at Fort Meade and ECIP project area fall into the “normally acceptable” range as defined by U.S. Army and HUD criteria.” The 2009 noise study identified ambient noise levels of between 55 and 65 DNL to be in the “normally acceptable” range depending on noise-sensitive receptor’s proximity to major roadways. Did the study consider noise sensitive receptors, in particular, the Children’s World Learning Center? Where is the Children’s World Learning Center in relation to the Proposed Action? The Children’s World Learning Center should be identified on a map. Projected ambient noise exposure to children as a result of implementation of the Proposed Action and cumulative actions (past and future) should be discussed in the FEIS.

Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks, requires each federal agency to identify and assess environmental health and safety risks to children. “Environmental health and safety risks” are defined as “risks to health or to

safety that are attributable to products or substances that the child is likely to come in contact with or ingest.” When conducting assessments of environmental risks, the lead agency should consistently and explicitly take into account health risks to children and infants from environmental hazards. Therefore, to the extent permitted by law and appropriate, and consistent with the agency’s mission, each Federal agency: shall make it a priority to identify and assess environmental health risks and safety risks that may disproportionately affect children; and shall ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks. Therefore, it is recommended that the EIS provide an assessment of potential exposures and susceptibilities to pollutants of concern for children, specific to the Proposed Action.

### **Cumulative Impacts**

It does not appear that the actions from the 2010 EIS are addressed and included in the Cumulative Effects Analysis. Page 2-14 states, “Because the baseline for the analysis in this EIS includes development of the southern portion of the East Campus, which would be completed or under construction by FY 2018, actions or projects that would be ongoing or starting in FY 2018 were considered for inclusion in the cumulative impacts analysis.” Unfortunately, the current EIS does not distinguish what has actually occurred on the southern portion of the East Campus as a result of the 2010 EIS. Because of the distinct relationship of the southern portion of the East Campus and the proposed development on the northern portion of the East Campus, it is imperative to include these actions whether completed as a result of the 2010 EIS or yet to be developed within the cumulatives impact analysis.

Page 2-15 states, “Past actions and development of the NSA Main Campus, the southern portion of the East Campus, and the vicinity of Fort Meade that could result in cumulative impacts are encompassed in the description of the existing conditions provided in this EIS (see Section 3).” Unfortunately, grouping actions grossly undermines cumulative impacts and misrepresents existing conditions. The Council on Environmental Quality in 40 CFR 1508.7 defines cumulative impacts as “impacts on the environment which result from the incremental impact of the action when added to other **past**, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions.” Therefore, the cumulative impacts assessment should include past actions and not assimilate them into existing conditions.

The FEIS should include a list of projects that have resulted from the 2010 EIS and included in the analysis of cumulative impacts. It is assumed that the projects presented/discussed in Section 2.5.1 (Future Actions on Fort Meade) on page 2-15 and as depicted in Figure 2-3 (Locations of Other Actions under Consideration for Cumulative Impacts) as well as those referenced in Section 5 (Cumulative and Other Impacts) do not include projects that resulted from the 2010 EIS. Please discuss the projects that resulted from the 2010 EISs and include in the Cumulative Impacts Analysis. In addition, an Environmental Assessment (EA) -- Addressing the Construction and Operation of the Cyber Center for Education and Innovation (CCEI) -- Home of the National Cryptologic Museum at Fort George G. Meade was not included in the cumulative impacts assessment. The new CCEI will be integrated with the NSA facility and infrastructure, allowing NSA to play a large role in the new CCEI’s security, operations, and maintenance. This proposed action was not mentioned in the current DEIS. Please discuss

where this proposed action will be in relation to the ECIP Proposed Action. In particular, please discuss potential cumulative effects from the increase in people expected on the NSA campus and campus roads.

Page 5-1 states, "Adverse impacts would include loss of open space and forested areas as office, retail, and residential areas are constructed." What is the cumulative loss or approximate loss not just from open space/forest removal that would result from the Proposed Action, but also from the subsequent creation of impervious surfaces particularly in currently undeveloped areas? The EIS did not discuss in terms of vegetation loss and increase in impervious surfaces from 2010 EIS, the current EIS, and future actions. Please address.

